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Attorneys for Plaintiff
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

No. CR 13-917-DMG

13 Plaintiff,

STIPULATION RE: MODIFICATION OF
PRETRIAL RELEASE CONDITIONS FOR
DEFENDANT CHARLES EVENS

14 v.

15 HUNTER MOORE and
CHARLES EVENS,
16 aka "Gary,"

17 Defendants.
18
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20 Plaintiff United States of America, by and through its counsel
21 of record, the United States Attorney's Office for the Central
22 District of California, and defendant CHARLES EVENS, both
23 individually and through his counsel of record, Deputy Federal
24 Public Defender Jill Ginstling, hereby stipulate and request the
25 Court to find and order as follows:

26 1. The 15-count indictment charges defendant and co-defendant
27 Hunter Moore each with violations of 18 U.S.C. § 371: Conspiracy; 18
28 U.S.C. §§ 1030(a)(2)(C), (c)(2)(B)(i): Unauthorized Access to a

1 Protected Computer to Obtain Information; 18 U.S.C. § 1028A:
2 Aggravated Identity Theft; and 18 U.S.C. § 2: Aiding and Abetting
3 and Causing an Act To Be Done. Defendants are released on bond
4 pending trial.

5 2. Defendant's previously set pretrial release conditions
6 prohibit him from possessing or having access to, either in the home
7 or any location other than the workplace, any device which offers
8 Internet access. Defendant agreed to submit to a search of his
9 person and/or property by Pretrial Services in conjunction with the
10 US Marshal in order to determine compliance. (See Docket No. 13.)

11 3. The parties hereby stipulate and ask the Court to modify
12 defendant's pretrial release conditions as follows:

13 a. Defendant shall not possess or have access to, either
14 in the home, the workplace, or any other location, any device which
15 offers Internet access. Defendant agrees to submit to a search of
16 his person and/or property by Pretrial Services in conjunction with
17 the US Marshal in order to determine compliance.

18 4. The defense reserves the right to ask the Court to modify
19 this condition in the future, should circumstances warrant a
20 modification.

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2 5. All of the other conditions of this bond shall remain in
3 effect.

4 IT IS SO STIPULATED.

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6 Respectfully submitted,

7 ANDRÉ BIROTTE JR.
United States Attorney

8 ROBERT E. DUGDALE
9 Assistant United States Attorney
Chief, Criminal Division

10 Dated: February 28, 2014

11 /s/
WENDY T. WU
Assistant United States Attorney

12 Attorneys for Plaintiff
13 UNITED STATES OF AMERICA

14 Dated: February 28, 2014

15 /s/ by e-mail authorization
JILL GINSTLING
Deputy Federal Public Defender
16 Counsel for Defendant
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